

March 13, 2017

VIA U.S. MAIL AND E-MAIL

Leslie Blake
Remedial Project Manager
U.S. Environmental Protection Agency, Region 5
Superfund Division (SR-6J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Re: General Notice of Potential Liability for the Gary Development Landfill
Site at 479 Cline Avenue, Gary, Lake County, Indiana, CERCLIS ID No:
IND77005916

Dear Ms. Blake:

I write on behalf of Honeywell International Inc. ("Honeywell") in response to the U.S. Environmental Protection Agency's ("EPA") February 27, 2017 letter notifying Honeywell of its potential liability pursuant to Section 107(a) of CERCLA, at the Gary Development Landfill Site ("Site"). Honeywell received this letter on March 7, 2017. EPA's letter states that it has received information indicating that Honeywell may have owned or operated the facility or generated or transported hazardous substances that were disposed of at the facility, and that Honeywell is therefore a potentially responsible party under CERCLA Section 107(a).

Attached to its letter, EPA enclosed correspondence from Illinois EPA to the Indiana State Board of Health, dated March 11, 1977. In that document, Illinois EPA indicates that Baron Blakeslee¹ had a permit to dispose of "special waste" in Calumet City, IL, but that "[f]or one reason or another, [sixteen] waste streams [were] apparently being diverted to areas in Indiana for disposal, mostly to a landfill in Gary." That correspondence characterized the waste generated by Baron Blakeslee as "still bottoms."

¹ Baron Blakeslee was acquired by Allied Chemical in 1984. Allied Chemical merged with Signal in 1985 and formed Allied Signal. Allied Signal acquired Honeywell Inc. in 1999; the company then became Honeywell International Inc.

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Honeywell has searched its records--which encompass those of Baron Blakeslee--for documents containing information related to the Site. While Honeywell has located documents indicating that Baron Blakeslee did indeed have a permit to dispose of waste in Calumet City, IL, and that it used Liquid Waste as a hauler in 1977, Honeywell did not locate any documents relevant to the Gary Landfill.

Given the available evidence, Honeywell believes that Baron Blakeslee had, at most, a de minimis or de micromis role at the Site. The available records indicate that waste may or may not have been sent to the Gary Landfill by a third party, and that disposal at the site, if any occurred, may have been limited to a single incident of a small amount of waste.

While Honeywell acknowledges the importance of working cooperatively with EPA and potentially responsible parties at Superfund Sites, and has in fact worked cooperatively with EPA and other PRPs in numerous such sites across the country, the situation at the Gary Landfill presents a scenario that Honeywell believes merits the approach of declining to join the PRP Group at this time, given the lack of a clear nexus to the Site. Honeywell informed the PRP group that it would consider participating as a de minimis contributor once there is a Record of Decision for the Site.

Please feel free to contact me if you have any questions.

Sincerely,



Laura Cottingham

cc: Tom Byrne, Honeywell International Inc.
Chuck Geadelmann, Honeywell International Inc.
John Morris, Honeywell International Inc.
Jeffrey Cahn, EPA